

3 Q. Were you aware that Mr. Ware passed the
4 written portion of the recertification test?

5 A. No.

6 Q. Did any other screening supervisor fail the
7 test?

8 A. When? When are you talking about?

9 Q. The time the test was done was
10 November 2003, right?

11 A. That's the second time we went through
12 recertification.

13 Q. When was the first?

14 A. I think it was the second. 2003 October.

15 Okay. That may have been the first. But there was
16 another supervisor that did fail.

17 Q. Was it Richard Kidani?

18 A. Richard Kidani.

19 Q. Was Richard Kidani terminated?

20 A. Yes.

21 Q. Was he terminated immediately?

22 A. If I can recall, I don't believe he was.

23 Q. Why not?

24 A. I think he submitted a rebuttal.

25 Q. How soon after he failed the test was he

3 A. One of the screening managers. I can't
4 was either Robin Wong or Lizzet Haneberg. I can't
5 recall which one.

6 Q. Would you agree that there's nothing in
7 his, in writing in his file stating that he had been
8 on the phone, cell phone for personal business?

9 A. At what time?

10 Q. At all. There's nothing in writing in his
11 personnel file or disciplinary file.

12 MR. HELPER: Let me object. The documents
13 speak for themselves.

14 A. I was told orally by one of the managers.

15 Q. (Ms. Barbee): So that I take it that's a
16 yes, that there's nothing in writing about that?

17 MR. HELPER: Same objection.

18 A. Yes.

19 Q. (Ms. Barbee): When passengers complain
20 about a screener, are those complaints documented
21 anywhere?

22 MR. HELPER: Objection. Overbroad, lacks
23 foundation.

24 A. We have a passenger complaint form that can
25 be filled out.

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1 terminated?

2 A. That, I'm not sure.

3 Q. Were you aware that Mr. Ware submitted a
4 rebuttal to his termination?

5 A. No.

6 Q. Was there another opportunity -- was there
7 another vacancy for screening manager in November of
8 2003?

9 MR. HELPER: I'm going to object to
10 "opportunity" as vague.

11 A. I'm not sure.

12 Q. (Ms. Barbee): Did you hire anybody else
13 for screening manager after October -- I mean,
14 sorry, after August 2003?

15 A. I'm not sure.

16 Q. Was it still part of your duties to select
17 people for screening manager?

18 A. Yes.

19 Q. Were there other vacancies for screening
20 manager after August 2003?

21 A. I would need to refer to paperwork to tell
22 you that, I'm not sure.

23 Q. In your declaration concerning Mr. Ware you
24 make reference to complaints about Mr. Ware being on
25 the cell phone for personal business.

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1 Q. (Ms. Barbee): What happens when those
2 complaint forms are filled out?

3 A. Goes to the managers.

4 Q. Are these complaints placed in the
5 disciplinary file of the screeners?

6 A. I'm not sure.

7 Q. Are these complaints kept by TSA?

8 MR. HELPER: Same objection.

9 A. They should be.

10 Q. (Ms. Barbee): Who would have these
11 complaints?

12 A. The managers.

13 Q. Do the managers have a file on the
14 screeners that is separate from your files?

15 A. Yes.

16 Q. Where are these files kept, the managers
17 files?

18 A. You would need to ask the managers.

19 Q. Do you know where your managers keep their
20 files on the screeners?

21 A. I have no idea.

22 Q. Did you ever ask the managers during your
23 meetings with them where they kept their files?

24 A. No.

25 Q. When you decide -- Do you need a break or